

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

**BILLIE BURKE**, *individually and on behalf  
of all others similarly situated*,

Plaintiff,

**AHS MEDICAL HOLDINGS LLC d/b/a  
ARDENT HEALTH SERVICES,  
ARDENT MEDICAL SERVICES, INC.  
d/b/a ARDENT HEALTH SERVICES,**

Defendants.

Case No. 3:23-cv-01308

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**ELIZABETH REDD**, *individually and on  
behalf of all others similarly situated*,

Plaintiff,

**AHS MEDICAL HOLDINGS, LLC d/b/a  
ARDENT HEALTH SERVICES,  
ARDENT MEDICAL SERVICES, INC.  
d/b/a ARDENT HEALTH SERVICES,**

Defendants.

Case No. 3:23-cv-01342

**PLAINTIFFS' UNOPPOSED MOTION  
TO CONSOLIDATE THE RELATED ACTIONS**

For the reasons set forth in the accompanying Memorandum of Law, Plaintiffs in the above-captioned actions respectfully request that the Court (1) consolidate these related cases pursuant to FED. R. CIV. P. 42(a).

A proposed order granting this requested relief is submitted herewith.

Dated: January 16, 2024

Respectfully submitted,

By: /s/ Lisa A. White

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*\*Pro Hac Vice admission forthcoming*

*Attorneys for Plaintiffs and the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>TH</sup> day of January, 2024, I caused the foregoing **PLAINTIFFS' UNOPPOSED MOTION TO CONSOLIDATE THE RELATED ACTIONS** to be filed electronically with the Clerk of Court by using the CM/ECF system which shall serve a copy on all counsel of record.

/s/ Lisa A. White

Lisa A. White (TN Bar No. 026658)